Rec' 1 8/16/89 ORIGINAL (Red)

PENNZOIL PRODUCTS COMPANY

PENNZOIL PLACE • P.O. BOX 2967 • HOUSTON, TEXAS 77252-2967 • (713) 546-4000

August 10, 1989

Vincent E. Zenone U.S. Environmental Protection Agency Region III SPCC Coordinator - 3HW32 841 Chestnet Building Philadelphia, PA 19107

Dear Mr. Zenone:

Per my telecon with Doug Fox on Wednesday, August 9, 1989, I am forwarding a copy of the latest S.P.C.C. plan for Pennzoil's Etowah terminal in Charleston, WV. Also enclosed is a copy of a spill report filed with your agency last year involving a truck incident at this terminal.

Please review these documents. If you have any questions or need any additional information, give me a call at (713/546-4714).

Sincerely yours

Charles W. Hartsell

Marine & Terminalling Administrator

CWH/nm Enclosures

cc: E. F. Boyd, Jr.

J. L. Hutchinson

M. S. Ishimoto

W. E. Ruhl

S. Y. Shen

Doug Fox - U.S. E.P.A

ATTACHMENT I

Facility Name and Address

Pennzoil Products Company	(Etowah Terminal)
1015 Barlow Dr.	
Charleston, WV 25333	

As required per 40 CFR 112.5(b), I have reviewed this SPCC plan and, to the best of my knowledge it remains current and accurate.

- 1). Charles W. Hartsell, Jr.
- 2). John L. Hutchinson

1). Chalis W. Hutal J.
2). Jahn R. Dutchinson

Signature

- 1). Marine & Terminal Adm. (Off-Site Mg
- 2). Branch Manager (On-Site Manager)

Title

1). August 3, 1989

2)· 8-7-89
Date

Attach to existing SPCC plan and send a copy to:

Michael S. Ishimoto Pennzoil Company P. O. Box 2967 Houston, Texas 77252-2967

ORIGINAL (Red)

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

PART I GENERAL INFORMATION

	lame of facility	Pennzoil Company (Etowah Terminal)
	ype of facility_	
	ocation of facil	1015 Pamley Drive
U . 12	Cation of facti	Charleston, WV 25333
4. N	ame and addre	ss of owner or operator:
	Name _	Pennzoil Company
		P. O. Box 2967
		Houston, TX 77292-2967 .
U U	ingacca perce	on accountable for oil spill prevention at facility:
	acili <u>ty</u> experier	title <u>William Havnes, Tankerman</u> nced a reportable oil spill event during the twelve months prior to Jan. 10, 19 of 40 CFR, Part 112). (If YES, complete Attachment #1.) No
	acili <u>ty</u> experier	nced a reportable oil spill event during the twelve months prior to Jan. 10, 19 of 40 CFR, Part 112). (If YES, complete Attachment #1.) No MANAGEMENT APPROVAL
	acility experier effective date	nced a reportable oil spill event during the twelve months prior to Jan. 10, 19 of 40 CFR, Part 112). (If YES, complete Attachment #1.) MANAGEMENT APPROVAL This SPCC Plan will be implemented as herein described.
	acility experier effective date Signature	nced a reportable oil spill event during the twelve months prior to Jan. 10, 19 of 40 CFR, Part 112). (If YES, complete Attachment #1.) MANAGEMENT APPROVAL This SPCC Plan will be implemented as herein described.
	acility experier effective date	nced a reportable oil spill event during the twelve months prior to Jan. 10, 19 of 40 CFR, Part 112). (If YES, complete Attachment #1.) MANAGEMENT APPROVAL This SPCC Plan will be implemented as herein described.

Registration No. 16399 State 4

PART I GENERAL INFORMATION

7. Potential Spills - Prediction & Control:

	Source-	Major Type of Failure	Total Quantity (bbls)	Rate (bbls/hr)	Direction of Flow	Secondary Containme
1.	Storage tanks	Corresion, Overfilling, Rupture	415,800 gal.	Varies	Varies	Dikeage
2.	In-Plant piping	Corrosion, Rupture	Varies	Varies	Varies	See below
3.	Truck Load/ Unload	Rupture, Overfill	4,000 gal.	Varies	Varies	See below
4.	Parge Handling	Hose, Rupture, Overfill	2,000 gal.	Varies	Varies	See below

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ı	D	١	51	٠.	1	2	C	1	റ	1	1	-	

Mostabove ground piping is within the diked area. Other piping with exception to the barg supply line is located on the east side of the dikes away from the river. A spill on the spills at loading racks will be contained in the immediate area.

would be containe spill boom.

4. All barge activity will require a tankerman to be on site with a boat and sufficient length of spill boom to contain a release. Also, drip pans are present to contain hose residual.

"Attach man if appropriate.

Name of facility	
Operator	

PART I GENERAL INFORMATION



8.	Containment or diversionary structures or equipment to prevent oil from reaching navigable waters are practicable. (If NO, complete Attachment ±2.)	
9.	Inspections and Records A. The required inspections follow written procedures. B. The written procedures and a record of inspections, signed by the appropriate	_
	supervisor or inspector, are attached. Discussion All areas of the facility are walked at least once daily by Pennzoil personnel and all tanks, valves and above ground pipelines	<u>-</u>
	are visually inspected at this time. Any leaks discovered are reported and repaired immediately. Records are kept of the maintenance performed.	_ _ _
	All barge hose is hydrostatically tested annually with records kept of the	is —
10.	Personnel, Training, and Spill Prevention Procedures A. Personnel are properly instructed in the following: (1) operation and maintenance of equipment to prevent oil discharges, and (2) applicable pollution control laws, rules, and regulations. Describe procedures employed for instruction: At least annually, supervisors will conduct a meeting on site with all personnel to review this plan and its objectives.	
		- - -
	B. Scheduled prevention briefings for the operating personnel are conducted frequently enough to assure adequate understanding of the SPCC Plan. YES Describe briefing program: Briefings are held annually and highlight any spill events that might have occurred, potential spill exposures,	
	malfunctioning components and any new precautionary measures that can be taken to prevent a spill.	_ _ _ _
		<u>-</u> - -
		_ _
Na	eme of facility	_
	erator	_

(Prior to completing Part II, Antomate an refer to regulations and instrument and CRIGINAL

PART II. ALTERNATE A DESIGN AND OPERATING INFORMATION ONSHORE FACILITY (EXCLUDING PRODUCTION)

_	All dike areas have valves that permit release of accumulated rainfall.
7	These valves are kept closed at all times.
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-	3.
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	Prainage from undiked areas is controlled as follows (include description of ponds, lay reatchment basins and methods of retaining and returning oil to facility): The truck unloading area is designed such that a ditch parallel to the roadway collects surface runoff. A valve is present to release accumulated water into the river. This accumulation is inspected before release to assure no oil gets into the river.
_	
_	
_	
a po	he procedure for supervising the drainage of rain water from secondary containment storm drain or an open watercourse is as follows (include description of (a) inspectional bullutants, and (b) method of valving security). (A record of inspection and drainage of the maintained on a form similar to Attachment #3):
12	ior to draining any diked areas, the inside of the dike is given a visu
_	The state of the s
Pi ii e	aspection. If any oil or residue is present in the dike, this material ither pumped away to storage or is cleaned up with absorbant pads. The
Prince so	espection. If any oil or residue is present in the dike, this material ither pumped away to storage or is cleaned up with absorbant pads. The purce of the oil is then investigated and the leak stopped. If there is contamination in the dike area, the dike drain is manually opened and
Pi e: so ti	espection. If any oil or residue is present in the dike, this material ither pumped away to storage or is cleaned up with absorbant pads. The purce of the oil is then investigated and the leak stopped. If there is contamination in the dike area, the dike drain is manually opened and be employee remains in close proximity to the valve. When the draining
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Property solutions and the solutions are solutions and the solutions are solutions and the solutions are solved as a solution are solutions are solved are s	ispection. If any oil or residue is present in the dike, this material ither pumped away to storage or is cleaned up with absorbant pads. The purce of the oil is then investigated and the leak stopped. If there is contamination in the dike area, the dike drain is manually opened and me employee remains in close proximity to the valve. When the draining emplete, the valve is manually close.
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PART II. ALTERNATE A DESIGN AND OPERATING INFORMATION ONSHORE FACILITY (EXCLUDING PRODUCTION)

E.	$\mathbf{B}_{\mathbf{l}}$	ulk Storage Tanks	
	1.	Describe tank design, materials of construction, fail-safe engineering features, a	and if
		needed, corrosion protection:	
٠.		All tanks are materially and structurally compatible with their conten-	
		All are of either riveted or welded mild steel plate construction, and	of
		sufficient strength to safely withstand such pressures and temperature	s as
		can be reasonably expected during their use. All meet applicable API	speci-
		fications.	
	2.	Describe secondary containment design, construction materials, and volume:	
		Dikes are of masonry construction and of a capacity adequate to contain	<u>n</u>
		the contents of the largest tank and still have sufficient freeboard for	or
	7	rainwater accumulation. The volume of the largest tank here is 415,80	0 gal
	_		
	3.	Describe tank inspection methods, procedures, and record keeping: All tanks are visually inspected daily during gauging. Due to correst	<u> </u>
		All tanks are visually inspected daily during gauging. Due to corrosi possibilities, all are periodically inspected for thickness as access	
		affords, or as prudent safeguarding dictates. Those tanks, if found f	au1+v
		as a result of the inspection, are repaired or replaced before returni	ng to
		service. Records are kept of such repairs.	
		Service. Records are kept of such repairs.	
	•		
	•		
		(a) Monitoring the steam return or exhaust lines for oil. Describe monitoring procedure:	/A
	ű.	(b) Passing the steam return or exhaust lines through a settling tank, skimmer,	
			/A
			/A
5	5. I	Disposal facilities for plant effluents discharged into navigable waters are	
	. (observed frequently for indication of possible upsets which may cause an oil spill	
			I/A -
	I	Describe method and frequency of observations:	
-	-		
	-		
	.]		
	_		
۸.	ame	e of facility	
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O	pera	ator	

PART II, ALTERNATE A DESIGN AND OPERATING INFORMATION ONSHORE FACILITY (EXCLUDING PRODUCTION)

Original (Red)

	cility Transfer Operations, Pumping, and In-plant Process	
1.	Corrosion protection for buried pipelines: (a) Pipelines are wrapped and coated to reduce corrosion.	No
	(b) Cathodic protection is provided for pipelines if determined necessary by electrolytic testing.	No
	(c) When a pipeline section is exposed, it is examined and corrective action taken as necessary.	Yes
2.	Pipeline terminal connections are capped or blank-flanged and marked if the pipeline is not in service or on standby service for extended periods. Describe criteria for determining when to cap or blank-flange: Any line which	Yes
	out of service for maintenance or temporarily shut down is isolated capping or blank blank-flanging.	by
3.	Pipe supports are designed to minimize abrasion and corrosion and allow for	
	expansion and contraction. Describe pipe support design: Pipe supports are constructed of either co- or steel and designed to minimize abrasion and corrosion.	Yes ncrete
	or seed and designed to minimize abrasion and corrosion.	
•		
	Describe procedures for regularly examining all above-ground valves and pipeline ing flange joints, valve glands and bodies, catch pans, pipeline supports, locking and metal surfaces): All pumps, valves, pipes and fittings are routinel	of valves, y
	inspected by the operators as a part of their operating duty. Leaks failures are immediately reported to the supervisor and promptly rep	
	Describe procedures for warning vehicles entering the facility to avoid damaging ground piping: All in-plant roadways used by vehicles are well defined	_and
	clear of above ground transfer systems.	
- , _		
	e of facility	
The T	alor	

PART H, ALTERNATE A DESIGN AND OPERATING INFORMATION ONSHORE FACILITY (EXCLUDING PRODUCTION)



D.		neility Tank Car & Tank Truck Loading/Unloading Rack and tank truck loading/unloading occurs at the facility. (If YES, complete	
		through 5 below.)	Yes
	1.	Loading/unloading procedures meet the minimum requirements and regulations of the Department of Transportation.	Yes
	2.	The unloading area has a quick drainage system.	Yes
	3.	The containment system will hold the maximum capacity of any single compartment of a tank truck loaded/unloaded in the plant. Describe containment system design, construction materials and volume: Any spill in this area is directed to a ditch on the east side the loading rack which will contain the product for clean up.	Yes
		An interlocked warning light, a physical barrier system, or warning signs are provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines. Describe methods, procedures, and/or equipment used to prevent premature departure: Warning signs are located at all loading/unloading areas addition, regular operating procedure requires that prior to depar an inspection be made to ensure that all lines are disconnected, verification to the tightly shut, and that there are no leaks.	ture
		Drains and outlets on tank trucks and tank cars are checked for leakage before loading/unloading or departure.	Yes
Ν	am	ne of facility	
0	per	rator	

PART II. ALTERNATE A DESIGN AND OPERATING INFORMATION ONSHORE FACILITY (EXCLUDING PRODUCTION)

Se	curity	
1.	Plants handling, processing, or storing oil are fenced.	Yes
2.	Entrance gates are locked and/or guarded when the plant is unattended or not in production.	Yes
3.	Any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or standby status.	Yes
4.	Starter controls on all oil pumps in non-operating or standby status are: (a) locked in the off position;	No Yes
5.	(b) located at site accessible only to authorized personnel. Discussion of items I through 4 as appropriate: The facility is fully sure by a cyclone fence, locked when unattended.	
	All tank water draw-off valves remain locked at all times when not operation.	in
	Switches to pumps are not locked. However, main electrical disconsistions are shut off to de-energize all pumps not in use. These disconnect switches are located within the locked confines of the ings.	
6.	Discussion of the lighting around the facility: The plant is equipped with to dawn lighting located so that any spill, vandalism, or mischiev	dust
	conduct would be readily detected.	
Nan	se of facility	
Jue	cator	

SPOC PLAN, ATTACHMENT ±1 SPILL HISTORY

Original (Red)

		navigable water	· · <i>,</i>
	•		
Date	Volume	Cause:	<u> </u>
"See Attac	ched Report"		
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		<u> </u>	
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Dete	Valuera	Causas	•
	voiume	Cause:	
	· · · · · · · · · · · · · · · · · · ·		
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Corrective ac			
	tion taken:		
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	tion taken:		
Plans for pre	tion taken: venting recurrence:		
Plans for pre	tion taken:		
Plans for pre	tion taken:		
Plans for pre	tion taken:		
Plans for pre	tion taken:		
Plans for pre	tion taken:venting recurrence:	Cause:	
Plans for pre	tion taken:venting recurrence:	Cause:	
Plans for pre	venting recurrence:	Cause:	
Plans for pre	tion taken:	Cause:	
Pians for pre-	tion taken:	Cause:	
Pians for pre-	venting recurrence:	Cause:	
Pians for pre-	venting recurrence: Volume tion taken:	Cause:	
Pians for pre-	venting recurrence:	Cause:	
Plans for pre-	venting recurrence:	Cause:	
Plans for pre-	venting recurrence:	Cause:	

SPCC PLAN, ATTACHMENT #2 OIL SPILL CONTINGENCY PLANS AND WRITTEN COMMITMENT OF MANPOWER



Secondary containment or diversionary structures are impracticable for this facility for the following reasons (attach additional pages if necessary):

Barge activity affords no positive means of secondary containment due to the physical layout of the dock. Therefore, to contain a spill, our contingency plan calls for a boat to be available with sufficient spill boom and sorbent material to collect any release of cil at this site due to hose rupture or overfill. Manpower to be utilized will come from our employees assisted by the barge crew.

	•	Yes
·	÷	Yes
		Yes
•		
	· · · · · · · · · · · · · · · · · · ·	

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SPCC PLAN. ATTACHMENT ±3 ONSHORE FACILITY BULK STORAGE TANKS DRAINAGE SYSTEM

Inspection Procedure:

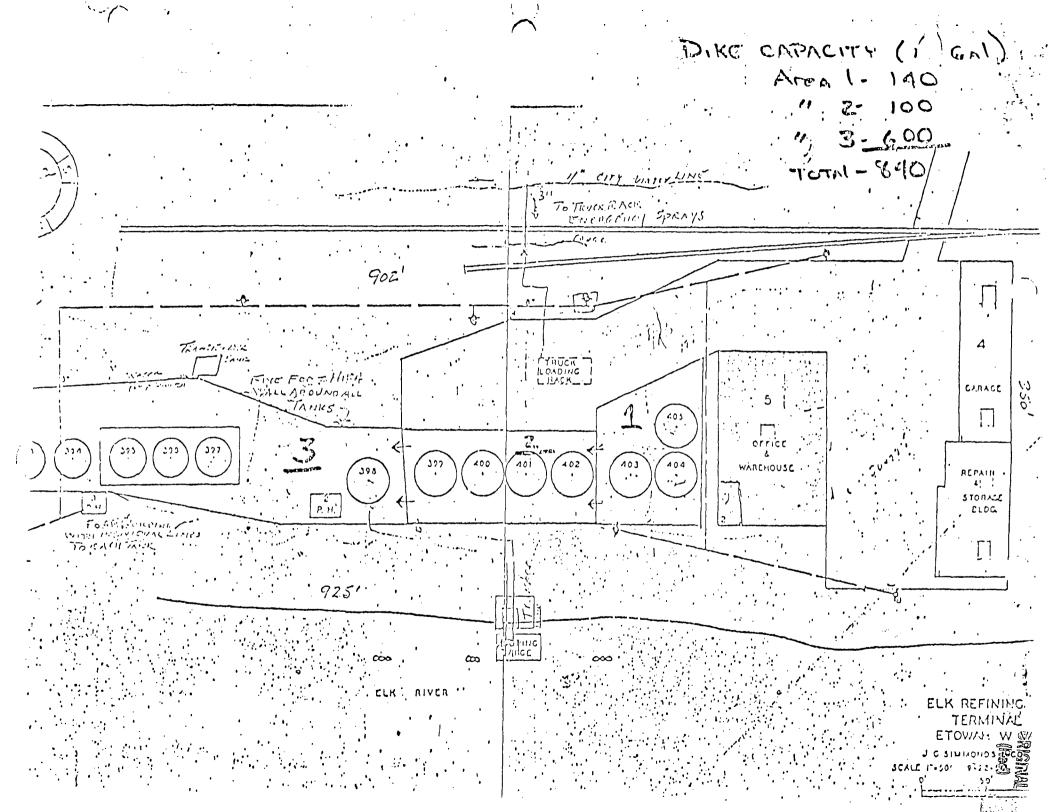
Prior to draining any diked areas, the inside of the dike is given a visual inspection. If any oil or residue is present in the dike, this material is either pumped away to storage or is cleaned up with absorbant pads. The source of the oil is then investigated and the leak stopped. If there is no contamination in the dike area, the dike drain is manually opened and the employee remains in close proximity to the valve. When the draining is complete, the valve is manually closed.

Record of drainage, bypassing, inspection, and oil removal from secondary containment:

Date of
Date of
Drainage

Name of facility _______

Operator_____



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MAR 21 REC'N



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

841 Chestnut Building Philadelphia, Pennsylvania 19107

IN REPLY REFER TO: 3HW22

PENNZOIL 1015 BARLOW DRIVE CHARLESTON, WV. 25333

MAR 1 8 1985

RE: WV88131 2-3-88 CHARLESTON, WV.

Gentlemen:

This office has received notification that your facility discharged oil or hazardous materials in quantities that may be harmful, in violation of Section 311(b)(3) of the Federal Water Pollution Control Act Amendments of 1972, 33 U.S.C. § 1321(b)(3). Pursuant to Section 308(a), 33 U.S.C. § 1318(a), you are hereby required to submit to EPA the following information. Any person who violates Section 308 is subject to a civil penalty of up to \$10,000 per day of violation. 33 U.S.C. § 1319(d). Further, any person who willfully or negligently violates Section 308 may be punished by a fine of not less than \$2,500, nor more than \$25,000 per day of violation, or by imprisonment for not more than one year or both. 33 U.S.C. § 1319(c)(1).

1.	Does the facility have a National Pollutant Discharge Elimination System (NPDES) Permit? YES or NO $_{YeS}$ If YES, state the Permit number: $_{WV0045225}$
2.	Does the facility currently have a Resource Conservation and Recovery Act (RCRA) Permit or is the facility under Interim Status?
	No
3.	Does the facility have a Spill Prevention Control and Countermeasure (SPCC) Plan certified and implemented in accordance with 40 CFR 112?
	YES or NO: Yes
4.	Time and date of discharge.
5.	Discharge began sometime after 4 PM ceased at approximately 11:30 PM (eastern) February 3, 1988 Date and time of discovery that the discharge was entering the waterways.
	Between 9 PM and 10 PM (eastern) February 3, 1988

	discharged (i.e., pipeline, tank, well, etc.):
	Tank truck over flow
•	Name and address of the owner of the vehicle or facility described above in (6).
	Par Mar Oil Company
	PO Box 1026
	Marietta, OH 45750
•	Name and address of the operator of the vehicle or facility described above in (6) and, if different from (7) above, describe the relationsh between the owner and operator (i.e., employee, subcontractor, lessee, etc.)
	Louis Woods - Driver
	Employee of Par Mar Oil Company
	Location of the discharge, including county and state.
	Popparail Products Co.
	Pennzoil Products Company
	Charleston, WV 25333 Kanawha County
	Charleston, WV 25333 Kanawha County List the type of oil and total storage capacities at the facility for any oil related products. Describe the storage tanks at the
	Charleston, WV 25333 Kanawha County List the type of oil and total storage capacities at the facility for any oil related products. Describe the storage tanks at the facility, (e.g., above ground, underground, etc.)
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•	Charleston, WV 25333 Kanawha County List the type of oil and total storage capacities at the facility for any oil related products. Describe the storage tanks at the facility, (e.g., above ground, underground, etc.) * See attached
•	Charleston, WV 25333 Kanawha County List the type of oil and total storage capacities at the facility for any oil related products. Describe the storage tanks at the facility, (e.g., above ground, underground, etc.) * See attached Material(s) discharged.
•	Charleston, WV 25333 Kanawha County List the type of oil and total storage capacities at the facility for any oil related products. Describe the storage tanks at the facility, (e.g., above ground, underground, etc.) * See attached Material(s) discharged.

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The	If YES, describe the first water reached and the location of t water. Elk River located in Kanawha County, Charleston, WV			
(b)	State the quantity of material entering the water described above in 13(a).			
Appi	roximately 50-60 gallons			
(c)	State the quantity of material reaching the shoreline of the w described above in 13(a) which did not enter the water.			
Approximately 50-60 gallons				
(d)	Was the water described above in 13(a), at the time of the spi a tributary of, or physically connected to a hydrological or c system? (YES or NO) Yes			
(e)	If the answer to 13(d) is YES, describe or name the waterways which the waters in 13(a) connect or flow.			
The	spill entered into the Elk River which flows into the Kanawha			
	er and eventually joins into the Ohio River.			
(f)	If the answer to 13(d) is NO, does the water described above i 13(a) periodically connect with or flow into any hydrological creek system? If YES, describe the flow and connection.			
Did	the discharge violate any applicable water quality standards, g., NPDES)? If YES, describe:			

.5•	Did the material cause a film, sheen, discoloration or irridescent appearance on the adjoining shorelines of, or surface of, any water described above in 13(a) (e) or (f)? If YES, describe:
	No
	
6.	Did the material cause any sludge or emulsion to be deposited on the adjoining shorelines of, or beneath the surface of, the waters describe above in 13(a) (e) or (f)? If YES, describe:
	No .
17.	Describe any observed damage to animal life or vegetation. None observed
	None observed
.8.	Describe in detail what actually caused the discharge.
	The tank truck driver, a customer's employee, over flowed his truck compartment. The product spilled onto the ground.
9.	Describe steps taken to contain and clean up the spilled material and mitigate environmental damage.
	The spill area and collection ditch were cleaned
20.	Describe action taken or proposed to prevent a recurrence of this type of spill.
	Discussion with this particular driver as well as others as to proper
	notification if an emergency occurs while they are loading during off-
	terminal hours. Also looking into proposals for spill containment pad at the truck loading rack.

•	List the federal and state agencies, if any, to which the owner or operator reported the discharge. Show the agency, its location, the date and time of notification and the official contacted.
	WVA DNR
	National Spill Response Center
	List the state and local officials who were on-scene at the spill during or after clean up.
	After clean-up WVA DNR Representative made inspection of sight issuing
	clean bill.
	List the names and addresses of persons believed to have knowledge of the facts surrounding this incident.
	No one was present at the terminal after the driver left with his load
	List any other information you wish to bring to the attention of the federal government.
	The above information should be mailed to:
	U.S. ENVIRONMENTAL PROTECTION AGENCY
	REGION III REMOVAL RESPONSE SECTION (3HW25)
	841 CHESTNUT STREET
	PHILADELPHIA, PA 19107
	ADD 4.4 com is it

If you cannot answer this letter by APK 1 1 1080 or if there are any questions on this matter, you may call Carol Oleksiak at (215) 597-0496.

Sincerely,

Stephen Jarvela, Chief

Removal Response Section

Signature

I hereby certify the above to be true and accurate to the best of my knowledge.

This information request is not subject to review by the Director of OMB pursuant to the requirements of the Paperwork Reduction Act, 44 U.S.C. § 3507.